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May 13, 2011

The Honorable Brian M. Cogan, USDJ
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Re: Secor Homes, Inc., Zalman Klein and Dina Klein, v. Shlomo Gutman, et al.
Docket No.: 11 Civ 02308 (BMC) (RML)

Your Honor:

We represent the plaintiffs in the referenced action, which has recently been assigned to Your Honor, upon transfer from the Southern District of New York.

This letter requests direction from the Court concerning our letter offer (enclosed) to remove from the complaint various attorney defendants, without prejudice. The letter seeks the consent of the defendants, pursuant to F.R.C.P. Rule 15(a)(2), to amend the complaint to remove the names and the claims asserted against certain attorney defendants.

Since we have received no response to our letter (dated May 10, 2011), we request that the Court schedule a conference, in the hopes of avoiding a motion to amend the complaint, and the numerous motions to dismiss requested by the attorney defendants.

No defendants have served answers yet, and although defaults were entered by the Clerk of the U.S.D.C., S.D.N.Y., before anyone appeared, attorneys have now appeared for most defendants. We do not intend to pursue defaults against any party who has appeared.

Respectfully submitted,



JOSEPH CHURGIN (JC 6854)
JAC/jp

cc: Edward Whipper, Esq. (via email - edward@ovedlaw.com)
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May 10, 2011

Via e-MAIL

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**Re: Secor Homes, Inc., Zalman Klein and Dina Klein, v. Shlomo Gutman, et al.,
11 Civ 00895**

Counsel:

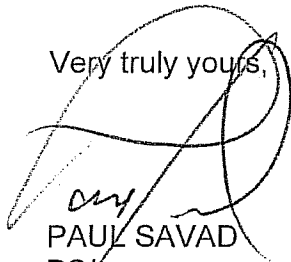
We write in accordance with Rule 15(a)(2) of the Federal Rules of Civil Procedure to request your consent to amend the Complaint to delete the listed individuals and entities as defendants, without prejudice to seeking leave to include them as defendants at a later date if appropriate.

Please be advised that we believe each individual deleted as a defendant has specific knowledge of facts and circumstances crucial to the prosecution of this case. We intend to conduct a deposition of each and utilize each as a material witness at trial, subject to proper privilege assertions.

In accordance with the foregoing, we hereby request your consent to amend the complaint to delete the following as defendants:

Darren Oved
Oved & Oved LLP
Aryeh Weber
Adam Drexler
Nicholas Fortuna
Allyn & Fortuna LLP

Very truly yours,



PAUL SAVAD
PS/mc